

IN THE UNITED STATES DISTRICT COURT  
FOR THE STATE OF DELAWARE

KERRY JOHNSON and  
SHARON ANDERSON,  
on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

GOVERNMENT EMPLOYEES  
INSURANCE COMPANY,  
GEICO CASUALTY COMPANY,  
GEICO GENERAL INSURANCE  
COMPANY, and GEICO INDEMNITY  
COMPANY,

Defendants.

C.A. No. 1:06-cv408 (JJF)

NON-ARBITRATION

TRIAL-BY JURY DEMANDED

CLASS ACTION

**STIPULATION OF AMENDMENT TO RULE 16 SCHEDULING ORDER**

Plaintiffs and Defendants, by and through undersigned counsel, hereby stipulate and agree, subject to approval of the Court, that the Rule 16 Scheduling Order [Docket No. 36], entered on November 13, 2007, shall be amended as follows:

2. **Joinder of other Parties.** All motions to join other parties shall be filed on or before March 1, 2009.

3. **Discovery.**

(a) Exchange and completion of interrogatories, identification of all fact witnesses and document production shall be commenced so as to be completed by August 1, 2008.

(e) Reports from retained experts required by Fed. R. Civ. P. 26(a) (2) are due from the plaintiff(s) by October 1, 2008; from the defendant(s) by December 1, 2008.

Should plaintiff(s) require rebuttal experts, then rebuttal experts' reports shall be due December 31, 2008.

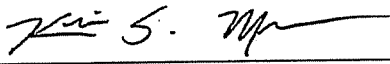
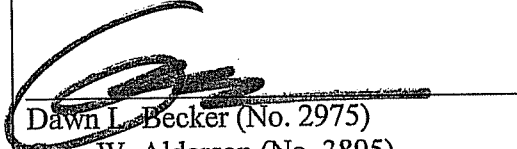
4. **Class Certification.**

(a) Plaintiffs shall file a motion and brief in support of class certification on or before March 1, 2009; Defendants shall file an answering brief to such motion on or before April 15, 2009; Plaintiffs shall file a reply in support of their motion on or before May 15, 2009.

6. **Amendment of the Pleadings.** All motions to amend the pleadings shall be filed on or before May 15, 2009.

7. **Case Dispositive Motions.** Any case dispositive motions, pursuant to the Federal Rules of Civil Procedure, shall be served and filed with an opening brief on or before March 1, 2009. Briefing shall be pursuant to D. Del. LR 7.1.2. No case dispositive motion may be filed more than ten (10) days from the above date without leave of the Court.

The parties reserve all rights to seek further relief from the November 13, 2007 Rule 16 Scheduling Order, as necessary.

<p>CROSS &amp; SIMON, LLC</p>  <p>Richard H. Cross, Jr. (No. 3576)          Christopher P. Simon (No. 3697)          Kevin S. Mann (No. 4576)          913 North Market Street, 11<sup>th</sup> Floor          P.O. Box 1380          Wilmington, Delaware 19899-1380          (302) 777-4200</p> <p><i>Attorneys for Plaintiffs</i></p>	<p>LAW OFFICES OF DAWN L. BECKER</p>  <p>Dawn L. Becker (No. 2975)          Gary W. Alderson (No. 3895)          Citizens Bank Center          919 Market Street, Suite 725          Wilmington, DE 19801          (302) 778-5784</p> <p><i>Attorneys for Defendants</i></p>
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SO ORDERED, this \_\_\_\_\_ day of \_\_\_\_\_, 2008

\_\_\_\_\_  
DATE

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The Honorable Joseph J. Farnan  
United States District Court for the District  
of Delaware